

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Kimball Area Public Schools,
Independent School District No. 739,

Civil No. 23-2637 (NEB/LIB)

Plaintiff and Counter Defendant,

**STIPULATION TO AMEND
PRETRIAL SCHEDULING
ORDER**

v.

I.R.M. by and through his parent, L.M.,

Defendants and Counter Claimants.

This stipulation is made and entered into on the date set forth below by and between the undersigned parties.

WHEREAS, on December 15, 2023, the Court issued a Pretrial Scheduling Order (Doc. 16), which stated that both Plaintiff/Counter Defendant's and Defendants/ Counter Plaintiffs' expert witness disclosures must be made on or before July 15, 2024;

WHEREAS, Defendants/Counter Plaintiffs L.M. and I.R.M placed their physical and mental health conditions at issue in their counterclaims;

WHEREAS, to date, Defendants/ Counter Plaintiffs have not provided Plaintiff/Counter Defendant with releases for all medical providers as requested by Plaintiff/Counter Defendant through discovery served on May 22, 2024;

WHEREAS, Plaintiff/Counter Defendant intends to provide expert testimony regarding the physical and mental conditions Defendants/Counter Plaintiff has placed at issue;

WHEREAS, the parties agree that an extension to the expert witness disclosure deadline is reasonable and necessary to allow the parties to engage in adequate discovery of the claims at issue in this case;

WHEREAS, good cause exists to amend the Pretrial Scheduling Order (Doc. 16) to extend the expert witness disclosures deadline;

WHEREAS, the parties agree to extend the deadline for initial expert witness disclosures to September 15, 2024 and the deadline for rebuttal expert witness disclosures to October 15, 2024; and

WHEREAS, all other provisions of the Pretrial Scheduling Order (Doc. 16), including the contents of expert disclosures, remain in full force and effect.

NOW, THEREFORE, the undersigned hereby agree to this Court's amendment of Pretrial Scheduling Order (Doc. 16) to extend the July 15, 2024 initial expert witness disclosures and August 15, 2024 rebuttal expert witness disclosures deadlines.

IN WITNESS WHEREOF, the undersigned have made and entered into this stipulation as of the date set forth below.

[Signature Page Follows]

KANE EDUCATION LAW, LLC

DATE: July 24, 2024

/s/ Margaret O'Sullivan Kane

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**ATTORNEYS FOR DEFENDANTS/
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L.R.M.**

**SQUIRES, WALDSPURGER &
MACE, P.A.**

DATE: July 24, 2024

/s/Elizabeth J. Vieira

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